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5 IN THE UNITED STATES DISTRICT COURT  
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
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8 IN RE: UBER TECHNOLOGIES, INC.,  
9 PASSENGER SEXUAL ASSAULT  
10 LITIGATION

11 This Document Relates to:  
12 ALL CASES  
13

Case No. 23-md-03084-CRB

**AFFIDAVIT OF TIFFANY R. ELLIS IN  
SUPPORT OF PLAINTIFFS' LIST OF  
DISPUTED ENTRIES FOR SPECIAL  
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in  
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing  
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for  
6 Special Master Review on April 24, 2025.

7 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for  
8 Special Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs  
9 incorporate the brief to support the specific reasons each entry on the List of Disputed Entries  
10 was challenged. The Brief included the general background of the privilege dispute process to  
11 date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a  
12 general argument for the challenges Plaintiffs raised.

13 4. The List of Disputed Entries for Special Master Review Plaintiffs provided on  
14 April 24, 2025 contained entries still in dispute for custodian Mike Akamine.

15 5. The List of Disputed Entries for Special Master Review Plaintiffs provided on  
16 April 24, 2025 did not contain any entries for the custodians that overlapped with custodians  
17 already submitted to the Special Master for review.

18 **Mike Akamine**

19 6. Defendants included approximately 949 entries for Mike Akamine across its  
20 Tranche 1, Tranche 2, Tranche 3, and Tranche 4 privilege logs.

21 7. Plaintiffs originally challenged approximately 495 of these 949 entries.

22 8. As of January 31, 2025<sup>1</sup>, Defendants withdrew their claim of privilege to 100  
23 entries in full and 38 entries in part.

24 9. On March 10, 2025, Defendants provided Plaintiffs with a revised privilege log  
25 after Defendants re-reviewed all entries in dispute pursuant to Master Order No. 2. Defendants  
26 withdrew their claim of privilege to 249 entries in full and 89 entries in part.

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28 <sup>1</sup> Defendants provided Plaintiffs a revised privilege log on January 31, 2025. This was the last revised privilege log  
Defendants provided before they started providing revised privilege logs in accordance with the Master Order No. 2.  
*See* ECF No. 2357.

